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**Reply to Newark Office [X]**

Of Counsel  
Douglas Mitchell, Esq.  
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September 8, 2020

**SENT VIA ECF**

Honorable Analisa Torres  
U.S. Southern District of NY  
500 Pearl Street  
New York, NY 10007

**Re: State of NY v Michael Thomas, et al.  
Docket No.: 1:19-cr-00830  
Adjournment Request**

Dear Hon. Judge Torres:

As you are aware, our firm represents Defendant, Michael Thomas, in the above-captioned matter. We are seeking an application for an adjournment of the January 4, 2021 trial date. Due to COVID-19 and my health concerns, combined with the fact that I need more time to complete my investigation, I am requesting that the Court adjourns the trial date to sometime in mid spring, preferably on or about May 3, 2021.

Respectfully yours,

/s/ Montell Figgins  
Montell Figgins, Esq.  
*Attorney for Defendant Michael Thomas*

cc: Nicolas Roos, Esq., *Counsel for Plaintiff*  
Rebekah Donaleski, Esq., *Counsel for Plaintiff*  
Jessica Lonergan, Esq., *Counsel for Plaintiff*  
Jason Erroy Foy, Esq., *Counsel for Defendant Noel*